

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
THIRD SET OF INFORMATION REQUESTS FROM THE D.T.E
D.T.E. 03-10

Date: April 14, 2003

Respondent: Thomas Birmingham

DTE 3-2: Please refer to the Company's responses in DTE 1-2.

- (a) Explain the discrepancies in the number of Consumer Division Cases per 1000 customers reported and the number reported in Bay State Gas Company, D.T.E. 99-72 for the following years: 1993, 1994, 1995.
- (b) Recalculate the mean and standard deviation taking into account the entire database available (1992-2001) and the Company's answer to DTE 3-2 (a).

RESPONSE:

- (a) The difference between the 1993 data submitted in DTE 1-2 related to the number of Consumer Division Cases per 1,000 customers and the 1993 data submitted on Schedule BSG-1-2 of the Company's August 6, 1999 SQ filing appears to be the difference between the total number of customers used in each respective calculation. The 1993 data in DTE 1-2 reflected the use of 220,658 residential customers. The Company was able to reproduce the previously reported 1993 value of 1.9 DTE complaints per 1,000 customers by using a value of 227,368 residential customers. The source of the two different residential customer counts for 1993 is a worksheet that included handwritten notes indicating the 220,658 value to be more accurate. The Company found this information while researching its response to DTE 1-2.

A similar situation applies to the difference between the 1994 data submitted in DTE 1-2 and the 1994 data submitted on Schedule BSG-1-2 of the Company's August 6, 1999 SQ filing. Specifically, the 1994 data in DTE 1-2 reflected the use of 224,245 residential customers. The Company was able to reproduce the previously reported 1994 value of 2.1 DTE complaints per 1,000 customers by using a value of 210,476 residential customers. The Company used the same source as described above for the two different 1994 residential customer counts.

Regarding the difference between the 1995 data submitted in DTE 1-2 and the 1995 data submitted on Schedule BSG-1-2 of the Company's August 6, 1999 SQ filing, Bay State is unable to recreate the CY 1.7 value attributable to DTE complaints per 1,000 customers that is shown on Schedule BSG-1-2 of the Company's August 6, 1999 SQ filing using any of the similar sources of data described above. In addition, the Company is unable to locate any other backup information supporting the previously reported 1995 CY value of 1.7.

- (b) Please see Attachment A for the requested information. The Company has used the same data presented in DTE 1-2 as the basis for calculating the 10-year historical benchmark for this measure, because it represents the best, most supportable information the Company currently has in its possession.